

BRENNEKE DECLARATION

EXHIBIT I

30(B)(6) THE GEO GROUP - RYAN KIMBLE; July 09, 2018

1

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

THE STATE OF WASHINGTON,
Plaintiff,
vs.
THE GEO GROUP, INC.,
Defendant.

No. 3:17-cv-05806-RJB

30(B)(6) DEPOSITION UPON ORAL EXAMINATION
OF GEO GROUP, INC.
IN THE PERSON OF
RYAN KIMBLE

9:50 a.m.
July 9, 2018

1250 Pacific Avenue 105
Tacoma, Washington 98401-2317



REPORTED BY: JACQUELINE L. BELLOWS, CCR 2297



APPEARANCES

For the Plaintiff:

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For the Defendant:

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1 Q (By Ms. Baker) You've been handed a document
2 that's marked as Exhibit 1. It's titled "Notice of
3 Deposition Pursuant to Civil Rule 30(b)(6) and Demand
4 for Designation of Representative's Deponents." Have
5 you seen this document before?

6 A. Yes.

7 Q. Can you take a moment to turn to page 7.

8 A. (Witness complies.)

9 Q. And please take a minute to read through
10 Exhibit B, which is titled "Matters for Examination."
11 Let me know when you're done reading through those
12 pages.

13 A. (Witness complies.)

14 MS. MELL: Do you want him to read the entire
15 exhibit?

16 MS. BAKER: That's correct. Okay.

17 Q (By Ms. Baker) So --

18 MS. MELL: Just for the record, you've read
19 pages 7 and 8 only.

20 Q (By Ms. Baker) So Exhibit B, the "Matters for
21 Examination" set forth the topics that Washington
22 requested Geo provide an organizational deponent for.
23 And you have been identified as the deponent with
24 information on all of these topics. So I'd like to take
25 a minute to go through each of these to make sure that



1 you are -- that you actually have knowledge for each of
2 these topics.

3 First is marked as A, staffing at the
4 Northwest Detention Center. A1 reads "organizational
5 structure of the Northwest Detention Center, i.e., who
6 supervises what activities, programs, and workers at
7 NWDC including detainee workers in the WVP." Do you
8 have information regarding this topic?

9 A. Yes.

10 Q. No. 2, "The labor and staffing model of NWDC
11 for each of the years from 2005 to the present,
12 including labor costs, expenses, and breakdown of those
13 expenses including number of employees, positions held,
14 salaries, compensation, and benefits." Do you have
15 information regarding this topic?

16 A. Yes.

17 Q. For every aspect of the topic that's listed in
18 this No. 2?

19 MS. MELL: My only objection would be that I
20 have indicated to you prior to the deposition that we
21 would make available who's competent to testify on
22 behalf of Geo from the local facility but we were
23 reserving the right to have corporate input. And
24 corporate's not here today. But this is the speaking
25 agent for Geo for purposes of this deposition to the



1 extent it doesn't implicate broader corporate
2 information that wouldn't be something that locally they
3 know.

4 MS. BAKER: So are you making the
5 representation that this 30(b)(6) is a limited 30(b)(6)
6 that does not have to do with corporate level, either
7 financial information or policies? We've not been
8 provided that.

9 MS. MELL: No. I don't believe the policy --
10 I think the policies are the policies that are applied
11 here at the Northwest Detention Center. But I think the
12 areas that we are going to take exception to today and
13 place objections to will be consistent with our position
14 that the disgorgement theory of the state not a --

15 MS. BAKER: So okay.

16 MS. MELL: No, no. Let me finish my
17 objection.

18 So we will be objecting to any pricing and
19 profitability questions that implicate Geo corporate.

20 MS. BAKER: So, Ms. Mell, you have not
21 actually provided information in Washington regarding
22 who you intend to put forward for a 30(b)(6) for
23 information regarding corporate finances. I want to
24 make sure that we have on the record that, although we
25 requested that in the 30(b)(6), we've not been provided



1 an opportunity to do that and we'll need to leave the
2 deposition open in order to ensure that we have access
3 to a deponent who has that information.

4 Q (By Ms. Baker) We'll go through these lists to
5 make sure that I understand fully the scope of the
6 information that you have so I don't end up asking
7 questions covering topics that you don't have
8 information about.

9 No. B, "Operation of the Voluntary Work
10 Program, B1 is "The number of detainee workers
11 participating in the Voluntary Work Program for each
12 year from 2005 to the present at the Northwest Detention
13 Center." Do you have information regarding that topic?

14 A. Yes.

15 Q. No. 2, "The days and times and average hours
16 detainees work in the Northwest Detention Center
17 Voluntary Work Program in the kitchen; laundry; law
18 library; outside recreation areas; barber shop; medical
19 care cleanup; intake and lobby cleanup; cleaning floors,
20 pods, living areas including information regarding the
21 schedule for when Geo officers escort detainee-workers
22 to and from their work details." Do you have
23 information regarding these topics?

24 A. Yes.

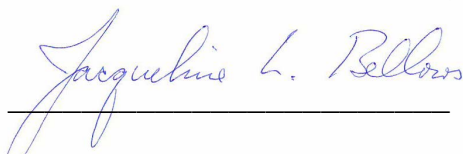
25 Q (By Ms. Baker) No. 3, "Any and all paperwork,



REPORTER'S CERTIFICATE

I, JACQUELINE L. BELLOWS, the undersigned
Certified Court Reporter pursuant to RCW 5.28.010 authorized
to administer oaths and affirmations in and for the State of
Washington, do hereby certify that the sworn testimony
and/or proceedings, a transcript of which is attached, was
given before me at the time and place stated therein; that
any and/or all witness(es) were duly sworn to testify to the
truth; that the sworn testimony and/or proceedings were by
me stenographically recorded and transcribed under my
supervision, to the best of my ability; that the foregoing
transcript contains a full, true, and accurate record of all
the sworn testimony and/or proceedings given and occurring
at the time and place stated in the transcript; that a
review of which was requested; that I am in no way related
to any party to the matter, nor to any counsel, nor do I
have any financial interest in the event of the cause.

WITNESS MY HAND AND DIGITAL SIGNATURE this
27th day of July, 2018.



Jacqueline L. Bellows
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